

## Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

NOV 2 1 1995

Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

Mr. Douglas R. Sherwood Hanford Project Manager U.S. Environmental Protection Agency 712 Swift Boulevard, Suite 5 Richland, Washington 99352-0539





TRANSMITTAL OF THE 300 AREA PROCESS TRENCHES MODIFIED CLOSURE/POST CLOSURE PLAN, DOE/RL-93-73, REVISION 1 (D-3-1)

- References: (1) RL ltr. to S. M. Alexander and D. R. Sherwood from J. E. Rasmussen and W. T. Dixon "Transmittal of the 300 Area Process Trenches Closure Plan, Revision O (D-3-1)," dtd. August 8, 1994.
  - (2) RL ltr. to S. M. Alexander and D. R. Sherwood from S. H. Wisness "Transmittal of the 300-FF-1 Phase III Feasibility Study (FS) Report, Draft A (DOE/RL-94-49)," dtd. August 8, 1994.
  - (3) Ecology ltr. to J. K. Erickson from T. A. Wooley "Review of the 300 Area Process Trenches Closure Plan DOE/RL-93-73," dtd. December 22, 1994.
  - (4) RL ltr. to S. M. Alexander and D. R. Sherwood from J. E. Rasmussen and W. T. Dixon "Transmittal of the Notice of Deficiency (NOD) Response Table for the 300 Area Process Trenches Closure Plan," dtd. March 14, 1995.

The U.S. Department of Energy, Richland Operations Office (RL), and Bechtel Hanford, Inc. are submitting the subject document for final approval by the State of Washington, Department of Ecology (Ecology). The closure plan documents a coordinated effort to close a Resource Conservation and Recovery Act (RCRA) treatment, storage, and disposal unit located within a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) operable unit (OU). Accordingly, the closure plan relies heavily on data and documentation produced from CERCLA work conducted for the 300-FF-1 OU.

A draft copy of the closure plan, as well as a draft of the "Phase III Feasibility Study (FS) Report for the 300-FF-1 Operable Unit," were transmitted for regulatory review in August 1994, Reference 1 and Reference 2.

- 60 to 1 3 4

respectively. RL received formal NODs on the draft closure plan from Ecology on December 22, 1994, (Reference 3) and officially responded to the NOD comments on March 14, 1995, (Reference 4). The closure plan has been revised in accordance with agreed upon NOD comments and other discussions with Ecology.

During later discussions with Ecology and the U.S. Environmental Protection Agency, a number of issues were raised resulting in additional technical reviews of analytical data and site conditions that, in some cases, enhanced or modified certain aspects of the closure plan and the 300-FF-1 FS Report. Rather than completely revise these documents, an addendum summarizing the discussions, data review and technical changes has been prepared and is attached in the front of each document. The addendum is considered a very important source of information that should be read prior to reading the remainder of the closure plan.

The closure plan has been prepared with a focus on performing a modified closure at the 300 Area Process Trenches in agreement with the preferred remedial action documented in the Proposed Plan for the 300-FF-1 and 300-FF-5 OUs. The preferred remedial action is excavation of contaminated soils above cleanup levels with disposal in the Environmental Restoration Disposal Facility. Cleanup levels will be in accordance with the State of Washington Model Toxics Control Act Method C Industrial Soil Cleanup Values.

The closure plan and related permit conditions are scheduled for public review in early December 1995, in conjunction with the Proposed Plan for the 300-FF-1 and 300-FF-5 OUs. This review will satisfy the requirements for a public comment period necessary to modify the Hanford Site Dangerous Waste Permit. It should be noted that although a review of the closure plan will occur in advance, the sitewide permit will be administratively modified in March 1996. to include the 300 Area Process Trenches.

Should you have any questions or require any additional information, please contact Mr. R. G. McLeod, RL, at 372-0096.

Sincerely,

James E. Rasmussen, Director // Environmental Assurance, Permits,

and Policy Division

DOE Richland Operations Office

RAP: RGM

Joseph F. Nemec, President Bechtel Hanford, Inc.

Enclosure

cc: See page 3

in the second of the second of

cc w/encl:

D. Bartus, EPA

M. Bauer, YIN L. Block, USFW

R. Buck, Wanapum

C. Burford, CTUIR

J. Carleton, WDFW

D. Conrad, NPT

R. Cook, YIN P. Danielson, NPT

D. Dunning, Oregon DOE

J. Ebaugh, CTUIR

D. Einan, EPA

J. Freedman, ATSDR

S. Hughs, Oregon DOE

J. Jakobosky, BLM M. Janaskie, EM-442

M. Jaraysi, Ecology (4)

R. Jim, YIN

J. McConnaughey, WDFW

D. Powaukee, NPT

P. Sleeger, DOI

S. Sobczyk, NPT

G. Tallent, Ecology

L. Treichel, EM-442

J. Wilkinson, CTUIR

T. Wooley, Ecology (4)

## cc w/o encl:

R. Buck, Jr., Wanapum

W. Burke, CTUIR

G. Eidam, ERC

S. Hajner, ERC

M. Hughes, ERC

H. Rueben, NPT

R. Stanley, Ecology